

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re:

Case No. 21-44887-lsg

**SILVERSIDE SENIOR LIVING,  
LLC, et al.,<sup>1</sup>**  
Debtor.

Chapter 11, Subchapter V

Hon. Lisa S. Gretchko

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**STIPULATION FOR ENTRY OF AGREED ORDER  
FOR THE REMOVAL OF DEBTOR IN POSSESSION  
UNDER 11 U.S.C. § 1185**

The United States Trustee, and the Debtors, by their respective counsel, and the Subchapter V Trustee, stipulate to the entry of an Agreed Order for the Removal of Debtor in Possession. A copy of the proposed Order is attached.

The United States Trustee asserts that the debtor should be removed from possession for cause. The parties stipulate that removal under Section §1185 is a suitable resolution and remedy, and removal will have limited impact on the remaining aspects of the case. The Debtors, non-operating entities, have negotiated a consensual plan with the assistance of the Subchapter V trustee. It is anticipated the plan will be confirmed. Until confirmation, there is nothing the Debtor is expected to do with its assets. It is safer, and practical, for the Subchapter V trustee

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<sup>1</sup> The debtors in these jointly administered proceedings along with the last four digits of their respective federal tax id numbers are Silverside Senior Living, LLC (2357) [Case No. 21-44887-lsg] and Graceway South Haven, LLC (9393) [Case No. 21-44888-lsg].

to take possession of the assets until the plan is confirmed, and to continue in possession thereafter when he is directed to make the plan disbursements.

**ANDREW R. VARA**  
**UNITED STATES TRUSTEE**  
Regions 3 and 9

**STROBL SHARP PLLC**

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**SUBCHAPTER V TRUSTEE**

By: /s/ Charles M. Mouranie  
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Sub Chapter V Trustee  
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Dated: November 9, 2022

UNITED STATES BANKRUPTCY COURT  
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SOUTHERN DIVISION

In re:

Case No. 21-44887-lsg

**SILVERSIDE SENIOR LIVING,  
LLC, et al.,<sup>2</sup>**  
Debtor.

Chapter 11, Subchapter V

Hon. Lisa S. Gretchko

**ORDER FOR THE REMOVAL OF  
DEBTOR IN POSSESSION UNDER 11 U.S.C. § 1185**

**THIS MATTER** came before the Court upon the Stipulation of the United States Trustee, the Debtor, and the Subchapter V trustee for an order removing the Debtor in Possession under 11 U.S.C. § 1185.

**IT IS HEREBY ORDERED** that the Stipulation of the parties is **APPROVED**; it is

**FURTHER ORDERED** that the debtor shall not remain in possession, and is removed under 11 U.S.C. § 1185.

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